PB90-258351

# OSWER Strategy for Management Oversight of the CERCLA Remedial Action Start Mandate

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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

OSWER DIRECTIVE 9355.0-24

MEMORANDUM

SUBJECT: OSWER Strategy for Management Oversight of the CERCLA Remedial Action Start Mandate

FROM: J. Winston Porter
Assistant Administrator

TO: Regional Administrators
Regions I-X

This memorandum establishes a process for managing EPA's efforts to achieve the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §116(e) statutory mandate for remedial action starts. It also establishes a process for setting expectations as to each Region's contribution toward this end, and providing guidance to enhance EPA's ability to meet these requirements. The attached OSWER strategy document contains the detailed information for this program.

Section 116(e) of CERCLA requires that we ensure that substantial and continuous on-site remedial action commences at facilities on the National Priorities List. Our mandate is to begin 175 first start remedial action projects by October 16, 1989, and an additional 200 first start remedial action projects by October 16, 1991. Specifics as to which projects will qualify against the mandate are provided in the strategy document.

One challenge presented to us by this statutory directive is to both begin new remedial action (RA) starts and proceed with subsequent operable unit starts at sites where RAs began prior to the Superfund Amendments and Reauthorization Act of 1986 (SARA). In most instances the subsequent starts will not count towards the RA goal, but we must balance the need to conduct work at the most serious environmental and health threatening sites with the need to meet the "175" figure.

The Agency will have to take aggressive action to ensure that the mandate is met. We will have to effectively plan and manage projects to avoid, or at least minimize, project slippage. I am committed to provide Headquarters support to help with project planning and problem solving so that schedules can be met.

We have examined our performance since SARA was passed as well as the FY'88 targets and FY'89 planning projections and believe that the "175" figure can be achieved, but we have little margin for project slippage. We must keep the remedial pipeline moving smoothly in order to initiate RAs on schedule. For example, RODs will have to be signed by the second quarter of FY'88 in order for the RD to be completed in time to start the RA by October 16, 1989.

In order to monitor our progress towards achieving the directive of 175 RA starts, Headquarters is developing a management plan (see the attached strategy) to help the Regions to closely track projects and anticipate, identify, and resolve issues that may cause delays.

A key element in our strategy is a review of the "175" candidate list of Fund and enforcement-lead sites by each Region. This review is to be completed by the Regions by January 23, 1988, and submitted to Paul Nadeau, Acting Director of the Hazardous Site Control Division, OERR, (WH-548E).

Your attention to this initiative is essential for the Agency to meet the statutory mandate. I look forward to working closely with each of your Regions in order to facilitate implementation of this strategy. Should you or your staff have any questions or comments, please contact Hal Snyder of OERR at 475-6707 or Mike Kilpatrick of OWPE at 382-4819.

Attachment

# OSWER STRATEGY FOR MANAGEMENT OVERSIGHT OF THE CERCLA REMEDIAL ACTION START MANDATE

## I. PURPOSE

OSWER developed this strategy for managing EPA's efforts to achieve the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) §116(e) statutory mandate for remedial action starts. This strategy establishes expectations as to each Region's contribution toward this end, and provides guidance to enhance EPA's ability to meet these requirements.

## II. BACKGROUND

Section 116(e) of CERCLA, which was enacted as part of the Superfund Amendments and Reauthorization Act (SARA) of 1986, requires the following:

The President shall ensure that substantial and continuous physical onsite remedial action commences at facilities on the National Priorities List (NPL), in addition to those facilities on which remedial action has commenced prior to the date of enactment of SARA, at a rate not fewer than:

(1) 175 facilities during the first 36-month period after enactment of SARA (by Oct. 16, 1989); and
(2) 200 additional facilities during the following 24 months after such 36-month period (by Oct. 16, 1991).

EPA has interpreted key elements of the SARA requirement as follows:

- Substantial and continuous - the remedial action represents an operable unit of the remedy leading to final cleanup and deletion of the site from the NPL. (These actions may include remedies at sites where removal authority is used to complete the remedial action leading to deletion from the NPL.)

- Commencement of physical on-site remedial action - the remedial action (RA) commences on the date when the managing agency (i.e., EPA, US Army Corps of Engineers, State) awards the construction contract for the operable unit or the potentially responsible party (PRP) has taken action equivalent to EPA contract award or taken equivalent action with their own work force.

- In addition to those facilities on which some remedial action has commenced prior to the enactment of SARA - the remedial actions to be applied toward the "175" figure will be SPMS first start projects commencing after the enactment of SARA.

A preliminary evaluation of FY '87 performance, FY '88 SPMS targets, and FY '89 projections indicates that it is possible to achieve the mandate. The following chart indicates where we stand:

| | Fund-lead | PRP-lead |
|---|---|---|
| FY87 RA Starts: | 25 | 15 |
| FY88 SPMS Targets | 49 | 24 |
| FY89 Projected | 53 | 35 |
| Total | 127 | 74 |
| Grand Total | 201 | |

The statutory definition of an RA start (i.e., construction contract award) differs from EPA's budget (SPMS) definition (i.e., obligation of funds) by about 2-3 months. Therefore, you should understand that achieving FY'89 expectations may be significantly affected unless projects can be started sufficiently early in the fiscal year to compensate for the difference in definitions.

## III. MANAGEMENT PLAN FOR MEETING THE MANDATE

A key element in being able to meet the statutory mandate will be an effective management plan shared by both Headquarters and the Regions. This plan will help tracking of projects and identifying and resolving problems and issues that might cause project delays.

The Agency will use the current SCAP/SPMS accountability system to track projects and focus attention on the early portions of project schedules. By focusing on the early portions of projects, site managers will be able to identify projects that could slip and arrange for appropriate assistance to keep projects on schedule.

OERR has developed example SCAP planning schedules for RDs (attachment A) and these schedules indicate that RODs should be signed by the second quarter of FY'88 in order to allow sufficient time to complete the RD and begin the RA in time to meet the statutory timeframe. Two of the most critical elements of the schedule are timely completion of the PRP negotiation moratorium prior to commencing design and the RA procurement process. These procurements must occur on a tight schedule, but should be procedurally correct in order to avoid bid protests which would cause the project to miss the "175 Program" mandate.

A. Determining the Candidate Sites

The first phase of the management plan is to identify candidate sites to be applied toward the "175" figure. Our immediate goal during the next several weeks will be to work with the Regions to accurately determine the number of likely projects.

Headquarters examined the SCAP/CERCLIS data base (includes negotiated SPMS RD and RA targets for FY'88 and preliminary expectations for FY'89) and identified the universe of sites that could potentially satisfy the SARA "175" mandate using the following criteria: 1) all sites currently showing an RA start in the fourth quarter of FY'89 or before on the SCAP; 2) all sites that have RODs by second quarter of FY'88 but have no RA start dates (predominantly Federal enforcement-(FE) and responsible party-(RP) lead); and 3) all sites with RODs through the second quarter of FY'88 but with no RA start dates scheduled until the first or second quarter of FY'90. The universe also included Federal facilities and state enforcement-lead actions.

A candidate list has been developed considering the above criteria (Attachment B) and the list shows both the total number of RA starts expected from the Region and the maximum number from this total that will likely be Fund-financed. The numbers show the need for EPA to have a successful settlement and enforcement program.

The next step will be for each Region to review and, if appropriate, add or drop sites from the draft candidate list. Regions should also identify first quarter FY'90 RA starts that could be potential candidates. In addition, if Regions propose to drop sites from the candidate list, please provide an explanation. For each Fund-financed candidate for FY'88, FY'89, and beyond, you should indicate the likelihood that a PRP will assume responsibility for the cleanup. This review is to be accomplished and returned to Paul Nadeau, Acting Director, Hazardous Site Control Division (WH-548E) in Headquarters by January 23, 1988.

Based upon this information, Headquarters will then revise FY'89 Regional expectations by identifying each Region's minimum contribution to the "175" figure. We will identify those sites where post-SARA RAs have already occurred along with the maximum number of Fund-financed RAs and minimum number of RP-lead RAs expected for FY'88. This will tell us how many RAs we will have to start in FY'89, and then we can proportionally assign Regional commitments.

Both Regions and Headquarters should rely on the CERCLIS Data Base to track each project after convergence of the other data systems is completed. The OECM docket will also be used to track enforcement cases and Consent Decrees. The OECM docket may require modification by including SSID numbers in order to facilitate tracking.

B. Develop Site-Specific Schedules and Action Plans

The second phase of the management plan will be to develop schedules and action plans for the candidate sites.

As mentioned earlier, OERR is currently developing example design schedules based upon our design experience to date with a variety of remedial alternatives. These schedules can assist Regional Project Managers in preparing accurate site-specific schedules. Hopefully, new program initiatives, such as the project management approach, will allow us to adopt shorter schedules for our new projects.

We expect the Regions to develop detailed site-specific schedules and action plans for each site very soon. For Fund-lead sites, project schedules should include all key milestones leading to construction contract award. Action plans should describe the project delivery approach (Corps, State, etc); define operable unit strategies; identify potential issues that could impact the project schedule (State cost share; site access; requirement for treatability testing during the RD; etc); and assign responsibilities for resolving the issues. The Corps of Engineers should be involved in setting schedules for projects for which they will be responsible. Headquarters (Fund and Enforcement) staff will visit the Regions to review the schedules and provide appropriate assistance. These visits should commence in January 1988 and hopefully involve both Regional staff and section chiefs.

In addition, these Regional visits will provide the first opportunity to identify major policy issues or other site-specific issues that may require assistance or resolution by Headquarters. Based upon the site-specific schedules that are developed during the visits, you may need to use fast track analysis to accelerate projects that could fall outside the "175" window.

C. Tracking Progress and Providing Technical Assistance

The third phase of the management plan will be to track progress in the quarterly reports showing planned and actual dates for each of the candidate sites. These will be developed from CERCLIS. Along with these basic site completion schedules, exception reports will be generated showing any projects where schedules have slipped, and any projects where planned or actual dates are beyond the dates for achieving timely RA starts. This report will form the basis for an OSWER management and Regional management quarterly progress briefing on each site.

## IV. PROGRAM INITIATIVES TO ENHANCE PERFORMANCE AGAINST THE MANDATE

OERR and OWPE are currently working on several initiatives that will enhance our ability to minimize project slippage and meet our mandate.

A. Fund-Lead Projects

OERR is currently negotiating RD and RA workloads with the U.S. Army Corps of Engineers (USACE) and Bureau of Reclamation (BUREC). The negotiations will focus on the projected workload, the role of these agencies in the Superfund program, the need for close working relationships with the Regions, and faster contracting procedures for assigned RDs and RAs.

In addition, OERR is currently implementing an Alternative Remedial Contracts Strategy (ARCS) to provide each Region with more and diverse contractor capability to perform RI/FSs, RDs, construction management, and selected RAs.

OERR is also considering a construction management support program to provide comprehensive program and project support for the planning and execution of RDs and RAs by making available a construction management specialist in the Region that might come from the REM/ARCS contractors, BUREC, or USACE.

Furthermore, OERR will conduct an analysis that will enable us to identify and resolve major issues inherent to the Fund program such as state cost assurances, disposal capacity, property acquisition, and O & M. This review would also include the potential for phased funding in order to allow for more initial starts, the implications of the land disposal restrictions beginning in November 1988, and RD/RA contracting procedures.

B. Enforcement-Lead Projects

OWPE intends to work with the Regions to set higher settlement expectations for FY'88 in order to increase the universe of sites where RAs will begin. The settlement process itself will also be expedited, where possible, and issues resolved, where necessary. Discussions with OECM and DOJ management are underway on this subject. All phases of the negotiation process are presently being examined and proposals being evaluated to improve the overall efficiency. Some specific initiatives are detailed below.

For pre-negotiation activities, Regions are encouraged to continue to send general notice letters early to allow better coalescing of PRPs. Headquarters will also be developing a Model Consent Decree in order to expedite discussions on legal "boiler plate".

Special Notice guidance is completed and emphasizes moratorium imposition when the feasibility study and proposed plan are released for public comment to ensure minimum delay in implementing projects once the ROD is signed. Headquarters will also be tracking negotiations to ensure that extensions are provided consistent with the February 12, 1987, guidance on "Streamlining the CERCLA Settlement Process".

Other discussions with DOJ and OECM are addressing post-settlement activities and focus on DOJ accountability, ensuring timely lodging of settlement. Other discussion topics include: pre-negotiation submittals, and requiring PRPs to initate RD at the time the consent decree is lodged. OWPE and OECM are preparing guidance on these topics. In addition, OWPE encourages the use of motions for summary judgment, and preliminary injunctions as appropriate.

Finally, OWPE and OERR are working with others in the Agency to develop a streamlined decision process by which a conditional remedy might be selected. For certain, appropriate cases this should permit earlier starts on the remedial action.

## V. RECOMMENDED REGIONAL INITIATIVES TO ENHANCE PERFORMANCE AGAINST THE MANDATE

In addition to Headquarters initiatives, we are recommending several concurrent initiatives that will help the Regions prevent or minimize project slippage. The recommendations are listed below:

- Use the project management concept whereby the same A/E firm is used for remedial investigation/feasibility study, remedial design, and construction management.

- Include schedules in all cooperative agreements, interagency agreements, contracts and work assignments, and Consent Decrees that will ensure that EPA meets the mandated targets.

- Consider State sanctions, penalty and award fee provisions of contracts, and enforcement of stipulated penalties of enforcement agreements when project schedules slip.

- Expand the universe of borderline cases for each Region by breaking out operable units, especially at sites including short-term surface cleanups and long-term, ground water remediation.

- Subject designs to value engineering, biddability, constructability, claims prevention, environmental, and operability reviews as appropriate to avoid construction initiation slippages and help ensure efficient implementation after award. These reviews must be carefully scheduled to avoid delaying the completion of the design phase.

Attachment A

## EXAMPLE DESIGN MANAGEMENT SCHEDULE

The following example indicates that in order for construction to be initiated (construction contract awarded) at a hypothetical site before October 17, 1989, the ROD would have to be signed no later than March 31, 1988. The actual duration of the design, which will affect both the scheduled ROD and construction contract award dates, will depend upon whether the project is Federal,-State-or enforcement-lead, the procedures to be used to procure the design firm, and the complexity of the remedy. Remember that these example schedules were derived from our experience to date; our intention for the future is to reduce the time for designs whenever possible.

| Milestones | Date |
|---|---|
| ROD signature | March 31, 1988 |
| PRP Negotiations Completed | April 30, 1988 |
| RD Start - Obligation | April 30, 1988 |
| - Consent Decree Lodging | May 31, 1988 |
| RA Fund Obligation | July 1, 1989 |
| RD Complete/Construction Presolicitation Notice | July 16, 1989 |
| Invitation for Bids | Aug. 16, 1989 |
| Submission of Bids | Sept. 16, 1989 |
| Contract Award | Oct. 16, 1989 |

FUND-LEAD
REMEDIAL ACTIONS

175 CANDIDATE LIST
FY 1988

| Region | State | Site Name | Lead | QtrStart | QtrComp |
|---|---|---|---|---|---|
| I | MA | Nyanza Chemical Waste Dump | F | 1/88 | 3/89 |
| II | NJ | Bog Creek Farm | F | 4/88 | 2/89 |
| | NJ | Caldwell Trucking | F | 4/88 | 1/89 |
| | NJ | Combe Fill North Landfill | S | 4/88 | 4/90 |
| | NJ | Combe Fill South Landfill | S | 4/88 | 4/89 |
| | NJ | GEMS Landfill | S | 4/88 | 4/89 |
| | NJ | Glen Ridge Radium Site | F | 2/88 | 2/92 |
| | NJ | Helen Kramer Landfill | F | 4/88 | 2/90 |
| | NJ | Lang Property | F | 3/88 | 4/88 |
| | NJ | Lone Pine Landfill | F | 4/88 | 1/90 |
| | NJ | Metaltec/Aerosystems | F | 3/88 | 4/89 |
| | NJ | Montclair/W. Orange Radium | F | 2/88 | 2/92 |
| | NY | American Thermostat Co. | F | 4/88 | 4/89 |
| | NY | Endicott Village Welfield | S | 4/88 | 4/89 |
| | NY | Haviland Complex | F | 4/88 | 1/90 |
| | NY | Katonah Municipal Well | F | 4/88 | 4/89 |
| | NY | Kentucky Avenue Well Field | S | 3/88 | 3/89 |
| | NY | Sinclair Refinery | S | 2/88 | 1/90 |
| III | MD | Kane & Lombard Street Drums | F | 4/88 | 2/92 |
| | PA | Mill Creek Dump | F | 4/88 | 2/89 |
| | PA | Moyers Landfill | F | 4/88 | 3/89 |
| | PA | Palmerton Zinc Pile | F | 2/88 | 4/90 |
| IV | FL | Coleman-Evans Wood Pres. | F | 4/88 | 2/90 |
| | FL | Davie Landfill | S | 1/88 | 4/89 |
| | FL | Hollingsworth Solderless | F | 1/88 | 2/90 |
| | FL | Miami Drum Services | S | 1/88 | 3/89 |
| | FL | White House Oil Pits | F | 4/88 | 4/91 |
| | KY | Distler Brickyard | F | 4/88 | 4/89 |
| | KY | Distler Farm | F | 4/88 | 4/89 |
| | SC | Geiger (C&M Oil) | F | 1/88 | 4/91 |
| | SC | SCRDI Dixiana | F | 3/88 | 4/89 |
| V | MI | Burrows Sanitation | F | 3/88 | 4/90 |
| | MI | Metamora Landfill | S | 2/88 | 4/89 |
| | MI | Novaco Industries | F | 2/88 | 1/90 |
| | MI | Spiegelburg Landfill | S | 2/88 | 3/90 |
| | MN | Lehillier/Mankato Site | S | 2/88 | 2/90 |

(FY'88 Continued)

| Region | State | Site Name | Lead | QtrStart | QtrComp |
|---|---|---|---|---|---|
| | OH | Arcanum Iron & Metal | F | 4/88 | 4/89 |
| | OH | New Lyme Landfill | F | 2/88 | 2/89 |
| VI | AR | Gurley Pit | F | 4/88 | 3/90 |
| | TX | Geneva Industries/Furhrmann | S | 1/88 | 2/89 |
| | TX | Odessa Chromium #1 | S | 1/88 | 1/89 |
| | TX | Odessa Chromium #2/Andrews | S | 1/88 | 1/89 |
| | TX | Petro-Chemical Systems | F | 1/88 | 4/88 |
| VIII | CO | Denver Radium Site | F | 2/88 | 3/89 |
| | CO | Rocky Mountain Arsenal | S | 2/88 | 3/89 |
| | ND | Arsenic Trioxide Site | S | 2/88 | 3/89 |
| IX | CA | Del Norte Pesticide Storage | F | 2/88 | 1/89 |
| | CA | Iron Mountain Mine | F | 3/88 | 2/89 |
| X | WA | Frontier Hard Chrome, Inc. | S | 4/88 | 2/89 |

FUND-LEAD
REMEDIAL ACTIONS

175 CANDIDATE LIST
FY 1989

| Region | State | Site Name | Lead | QtrStart | QtrComp |
|---|---|---|---|---|---|
| I | CT | Yaworski Waste Lagoon | F | 4/89 | 4/90 |
| | MA | Baird & McGuire | F | 3/89 | 3/91 |
| | RI | Davis Liquid Waste | F | 1/89 | 4/89 |
| II | NJ | Florence Land Recontouring | S | 2/89 | 1/90 |
| | NJ | Goose Farm | F | 1/89 | 2/90 |
| | NJ | Pijack Farm | F | 2/89 | 3/89 |
| | NJ | Sharkey Landfill | S | 3/89 | 2/91 |
| | NJ | Spence Farm | F | 2/89 | 4/89 |
| | NJ | Syncon Resins | S | 2/89 | 3/90 |
| | NJ | Waldick Aerospace Devices | F | 3/89 | 4/90 |
| | NY | Fulton Terminals | F | 3/89 | 3/90 |
| | NY | Marathon Battery Corp. | F | 3/89 | 2/91 |
| | NY | Wide Beach Development | F | 1/89 | 3/90 |
| III | MD | Southern MD Wood Treating | F | 3/89 | 3/91 |
| | PA | Berks Sand Pit | S | 4/89 | 4/90 |
| | VA | L. A. Clarke & Son | F | 4/89 | 4/91 |
| | VA | Rhinehart Tire Fire Dump | F | 4/89 | 4/90 |
| | VA | Saltville Waste Disp. Ponds | F | 1/89 | 1/90 |
| IV | FL | Pioneer Sand Co | F | 1/89 | 4/89 |
| | FL | Tower Chemical Co. | F | 3/89 | 4/90 |
| | FL | Zellwood Ground Water | F | 3/89 | 4/91 |
| | SC | Independent Nail Co. | F | 2/89 | 2/91 |
| | SC | Palmetto Wood Preserving | F | 2/89 | 2/90 |
| | TN | American Creosote/Jackson | F | 4/89 | 4/90 |

(FY'89 Continued)

| Region | State | Site Name | Lead | QtrStart | QtrComp |
|---|---|---|---|---|---|
| V | IL | Belvidere Municipal Landfill | S | 4/89 | 1/91 |
| | IL | Byron Salvage Yard | S | 4/89 | 3/91 |
| | IN | Marion (Bragg) Dump | F | 2/89 | 1/91 |
| | MI | Liquid Disposal, Inc. | S | 3/89 | 1/91 |
| | MI | Rose Township Dump | S | 3/89 | 1/91 |
| | MI | Springfield Twp Dump | S | 3/89 | 1/91 |
| | MN | Arrowhead Refinery Co. | F | 2/89 | 1/91 |
| | MN | South Andover Site | S | 4/89 | 2/91 |
| | OH | Laskin/Poplar Oil Co. | F | 3/89 | 4/90 |
| | OH | Pristine, Inc. | F | 4/89 | 1/91 |
| | OH | United Scrap Lead Co., Inc. | F | 4/89 | 1/93 |
| | WI | Eau Claire Mun Well Field | F | 4/89 | 2/91 |
| VI | LA | Bayou Bonfouca | F | 1/89 | 2/92 |
| | OK | Compass Industries (Avery Dr.) | S | 4/89 | 4/90 |
| | TX | Crystal City Airport | S | 1/89 | 4/90 |
| | TX | Sikes Disposal Pits | S | 4/89 | 2/94 |
| | TX | Sol Lynn/Indust. Transf. | S | 4/89 | 2/90 |
| VII | KS | Arkansas City Dump | S | 4/89 | 1/90 |
| | KS | Cherokee County | F | 3/89 | 4/90 |
| VIII | CO | Central City-Clear Creek | F | 2/89 | 4/90 |
| IX | AZ | Litchfield Airport Area | FE | 2/89 | 1/90 |
| | AZ | Tucson Int'l Airport Area | S | 3/89 | 1/91 |
| | CA | San Gabriel Valley/Area 2 | F | 2/89 | 1/90 |
| | CA | Selma Treating Co. | F | 3/89 | 3/90 |
| X | ID | Bunker Hill Mining & Metal | F | 2/89 | 4/89 |
| | WA | Colbert Landfill | S | 4/89 | 4/91 |
| | WA | Northwest Transformer | F | 4/89 | 3/91 |

FY'87 Enforcement RA Candidates (Actual)

| REGION | State | SITE NAME | LEAD | RD QtrStart | RA QtrStart |
|---|---|---|---|---|---|
| I | ME | Winthrop Township | RP | 3/24/86 | 11/19/86 |
| | NH | Auburn Road L/F | RP | 87/3 | 4/15/87 |
| | CT | Kellogg-Deering | RP | 87/3 | 9/3/87 |
| | ME | McKin | RP | 7/10/86 | 3/16/87 |
| II | NY | Hooker (Hyde Park) | RP | 86/4 | 87/3 |
| | NJ | Olean Well Field | RP | | 87/4 |
| III | PA | Taylor Borough Dump | RP | 5/28/87 | 5/28/87 |
| IV | FL | Pepper Steel | RP | 3/1/86 | 3/26/87 |
| V | IN | Seymour | RP | 1/15/87 | 8/17/87 |
| | IL | ACME Solvent | RP | 9/30/86 | 2/1/87 |
| | IL | Wauconda S & G | RP | 5/1/87 | 5/1/87 |
| | MN | TCAAP | FF | | 9/29/87 |
| | IL | Savanna Army Depot | FF | | 87/3 |
| VI | LA | Petro Processors | RP | 9/23/86 | 6/30/87 |
| VII | IA | Des Moines TCE | RP | 10/1/86 | 87/3 |

FY'88 Enforcement RA Start Candidates

(Not Shown - Enforcement Confidential)